

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

SOUTH CAROLINA STATE CONFERENCE  
OF THE NAACP,

Plaintiff,

v.

TONNYA K. KOHN, in her official capacity as  
South Carolina State Court Administrator;

DONALD W. BEATTY, in his official capacity  
as Chief Justice of the South Carolina Supreme  
Court,

Defendants.

C/A No.: 3:22-cv-01007-MGL

**ANSWERS TO LOCAL CIVIL RULE  
26.01 INTERROGATORIES ON  
BEHALF OF DEFENDANTS**

Defendants, by and through their undersigned counsel hereby submit the following responses to the interrogatories contained in Local Civ. Rule 26.01 (D.S.C.):

1. State the full name, address, and telephone number of all personal or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE:**

**None.**

2. As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE:**

**This matter should be tried nonjury because it involves only declaratory and injunctive relief.**

3. State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten

percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**RESPONSE:**

**Not applicable.**

4. State the basis asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**RESPONSE:**

**Defendants are not aware of any basis to challenge the appropriateness of the Columbia Division.**

5. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number in the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happening or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE:**

**Defendant is not aware of any related action filed in the District of South Carolina.**

6. If the Defendants are improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**RESPONSE:**

**Not applicable.**

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**RESPONSE:**

**Not applicable.**

Respectfully submitted,

CROWE LAFAVE, LLC

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*Counsel for Defendants*

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